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October 12, 2018

Hon. Thomas J. McAvoy
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *USA v. Reynolds*
3:18-mj-00139-TWD

Dear Judge McAvoy:

Please be advised that this firm, together with Attorney Kimberly Zimmer of Syracuse, New York, represent Maximilien Reynolds in this case. A change of plea proceeding is scheduled for November 6, 2018 at 11:30 A.M. in Binghamton.

At the change of plea proceeding, we will be asking the Court to release Mr. Reynolds on bail pending sentencing, subject to strict conditions involving professionally recommended treatment that Mr. Reynolds is not able to receive under current circumstances. To support the application, we are intending to file a Notice of Motion, Motion, Memorandum of Law and other supporting materials, including affidavits, that detail extensive personal and medical information concerning Mr. Reynolds. Therefore, this is to request your Honor's permission to file such confidential and private materials under seal.

Of course, we will provide copies of all such materials to AUSA Richard Southwick and to the United States Department of Probation simultaneously, and immediately after a sealing order is issued.

Respectfully yours,


Raymond M. Schlather

cc: AUSA Richard Southwick
Kimberly Zimmer, Esq.